

# **ATTACHMENT 1**

**BellSouth Telecommunications, Inc.**  
**Legal Department**  
1025 Lenox Park Boulevard  
Suite 6C01  
Atlanta, GA 30319-5309

bennett.ross@bellsouth.com

**Bennett L. Ross**  
General Counsel - Georgia

404 986 1718  
Fax 404 986 1800

May 23, 2002

**DELIVERED BY HAND**

Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, Georgia 30334-5701

Re: *Investigation Into Development of Electronic Interfaces for BellSouth's  
Operations Support Systems; Docket 8354-U*

*Performance Measurements for Telecommunications Interconnection,  
Unbundling and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

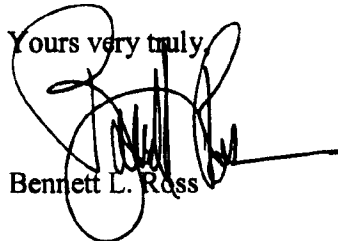
Consistent with the Report filed by BellSouth Telecommunications, Inc. ("BellSouth") on March 22, 2002, BellSouth is completing the process of upgrading to Version 4.0 of its Performance Measurement and Analysis Platform ("PMAP"). In connection with that upgrade, BellSouth is planning to implement certain changes to the method of calculating its performance measurement results. These changes are intended to ensure consistency with the Service Quality Measurement ("SQM") Plan, to address certain data issues previously identified, and to resolve concerns raised by KPMG Consulting, Inc. These changes are described in detail in the enclosed Notification Report, which includes a description of each change, the reason for the change, and an estimate of the impact of the change, if available.

In the Reply Comments filed by the Commission on March 28, 2002 in CC Docket No. 02-35, the Commission Staff indicated that it would include in its recommendation in Docket 7892-U "a requirement that would obligate BellSouth to provide written notice of any proposed changes to the method of calculating any performance measurement prior to such changes being implemented." BellSouth will comply with whatever notification process the Commission ultimately adopts. In the meantime, however, BellSouth is filing the enclosed Notification Report to provide the Commission and interested parties with prior notice of the changes being made.

Mr. Reece McAlister  
May 23, 2002  
Page 2

Enclosed please find an original and eighteen (18) copies, as well as an electronic version, of BellSouth's Notification Report, and I would appreciate your filing same and returning the three (3) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

Thank you for your assistance in this regard.

Yours very truly,  
  
Bennett L. Ross

BLR:nvd  
Enclosures

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)  
Parties of Record (w/enclosure) (via electronic mail)

448099/448098

**PARTIES OF RECORD**  
**Docket No. 8354-U and 7892-U**

Kristy R. Holley, Division Director  
Consumers' Utility Counsel  
47 Trinity Avenue, S.W.  
4<sup>th</sup> Floor  
Atlanta, GA 30334-4600  
404-656-3982 (o)

Charles A. Hudak  
Friend, Hudak & Harris, LLP  
Three Ravinia Drive  
Suite 1450  
Atlanta, GA 30346-2131  
770-399-9500 (o)

Suzanne W. Ockleberry  
AT&T  
1200 Peachtree Street, NE  
Suite 8100  
Atlanta, GA 30309  
404-810-7175 (o)

Charles V. Gerkin Jr.  
Attorney at Law  
Suite 610 - PMB 307  
4135 LaVista Road  
Tucker, GA 30085-5003  
770-414-4206 (o)

Jeremy D. Marcus  
Blumenfeld & Cohen  
[Co-Counsel for Rhythm, aka ACI Corp.]  
1625 Massachusetts Avenue, N.W.  
Suite 300  
Washington, DC 20036  
202-955-6300 (o)

John P. Silk  
Georgia Telephone Association  
1900 Century Boulevard, Suite 8  
Suite 8  
Atlanta, GA 30345  
404-321-5368 (o)

Newton M. Galloway  
Smith, Galloway, Lyndall & Fuchs  
Suite 400 First Union Bank Tower  
100 South Hill Street  
Griffin, GA 30229  
770-233-6230 (o)

John Kerkorian  
Mpower Communications Corp.  
Two Premier Plaza  
5607 Glenridge Drive, Suite 310  
Atlanta, GA 30342  
404-554-1217 (o)

Carolyn Tatum Roddy  
Troutman Sanders, LLP  
600 Peachtree Street, N.E.  
Suite 5200  
Atlanta, GA 30308  
(404) 885-3000 (o)

Frank B. Strickland  
Strickland Brockington & Lewis  
[Counsel for e.spire]  
P. O. Box 942358  
Atlanta, GA 31141-2358  
(404) 885-5744 (o)

William Bradley Carver  
Alston & Bird LLP  
One Atlantic Center  
1201 West Peachtree Street  
Atlanta, GA 30309-3424  
404-881-7000 (o)

Daniel S. Walsh  
Attorney General Office  
Department of Law-State of Georgia  
40 Capitol Square, S.W.  
Atlanta, GA 30334-1330  
404-657-2204 (o)

Eric J. Branfman  
Richard M. Rindler  
Swidler & Berlin  
3000 K Street, NW, Suite 300  
Washington, DC 20007  
202-945-6940 (o)

Robert A. Ganton  
Regulatory Law Office  
Dept. Army  
Suite 700  
901 N. Stuart Street  
Arlington, VA 22203-1837  
703-696-1645 (o)

Peter C. Canfield  
Dow Lohnes & Albertson  
One Ravinia Drive, Suite 1600  
Atlanta, GA 30346  
770-901-8800 (o)

James M. Tennant  
Low Tech Designs, Inc.  
1204 Saville Street  
Georgetown, SC 29440  
803-527-4485 (o)

Jeffrey Blumenfeld  
Elise P. W. Kiely  
Blumenfeld & Cohen  
1625 Massachusetts Avenue, N.W.  
Suite 300  
Washington, DC 20036  
202-955-6300 (o)

Anne E. Franklin  
Arnall Golden & Gregory, LLP  
[Counsel for Broadslate, NorthPointe]  
2800 One Atlantic Center  
1201 West Peachtree Street  
Atlanta, GA 30309  
404-873-8536 (o)

Harris R. Anthony  
BellSouth Long Distance  
400 Perimeter Center Terrace  
Suite 350 – North Terraces  
Atlanta, GA 30346  
(770) 352-3116 (o)

Charles F. Palmer  
Troutman Sanders LLP  
5200 NationsBank Plaza  
600 Peachtree Street, NE  
Atlanta, GA 30308-2216  
404-885-3402 (o)

Judith A. Holiber  
Morgenstein & Jubelirer  
One Market  
Spear Street Tower, 32nd Floor  
San Francisco, CA 94105  
415-901-8700 (o)

Nanette S. Edwards  
Regulatory Attorney  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
256-382-3856 (o)

James A. Schendt  
Regulatory Affairs Manager  
Interpath Communications, Inc.  
P. O. box 13961  
Durham, NC 27709-3961  
919-253-6265 (o)

William R. Atkinson  
Sprint Communications Company L.P.  
3100 Cumberland Circle  
Mailstop GAATLN0802  
Atlanta, GA 30339  
404-649-6221 (o)

D. Mark Baxter  
Thomas M. Browder, III  
Stone & Baxter, LLP  
577 Mulberry Street  
Suite 1111  
Macon, GA 31201  
478-750-9898 (o)

David I. Adelman, Esquire  
Charles B. Jones III, Esquire  
C. Christopher Hagy, Esquire  
Hayley B. Riddle, Esquire  
Sutherland, Asbill & Brennan LLP  
999 Peachtree Street, NE  
Atlanta, GA 30309-3996  
(404) 853-8206 (o)  
[Counsel for ITC^DeltaCom, WorldCom]

Walt Saprnov  
Gerry & Saprnov, LLP  
Three Ravinia Drive  
Suite 1455  
Atlanta, GA 30346-2131  
770-395-9100 (o)

Genevieve Morelli  
Andrew M. Klein  
Kelley Drye & Warren LLP  
[Counsel for KMC Telecom]  
1200 Nineteenth Street, N.W.  
Washington, DC 20036  
202-877-1257 (o)

Mark M. Middleton, Esquire  
Mark M. Middleton, P.C.  
350 Parkway Lane  
Norcross, GA 30092  
404-806-0808 (o)  
[Counsel for CTAG]

## APRIL DATA NOTIFICATION

As part of the upgrade to Version 4.0 of BellSouth's Performance Measurement and Analysis Platform ("PMAP"), which is used to generate the performance reports filed with the Commission, BellSouth will be implementing certain changes to the method of calculating its performance measurement results. These changes, described below, will be included in PMAP Version 4.0, which will be used to generate results for the April data month, which are scheduled to be posted on May 31, 2002. BellSouth provides this notice to the CLECs and the Commission pursuant to the state commissions' desire that BellSouth provide written notice of any proposed changes to the method of calculating any performance measurement prior to such changes being implemented. At such time as a state commission implements a formal notification process, BellSouth will comply with that process. All impacts are stated at the measurement, as opposed to sub-metric level unless otherwise stated.

### ORDERING MEASUREMENTS:

- In previous months, a discrepancy in Reject Interval and Firm Order Confirmation ("FOC") Timeliness performance was caused by the fact that some of BellSouth's systems are on Eastern Time, and some are on Central Time, and that the normalized OSS downtime exclusion had not been implemented for xDSL orders. As a result, BellSouth's performance was being understated. With April 2002 data, BellSouth is fixing both of these issues, which should increase reported performance by 1-3% for Reject Interval and a negligible amount for FOC Timeliness.
- When a CLEC sends a large volume of nearly identical orders via fax to the Local Carrier Service Center ("LCSC"), the service representative may bulk load those orders via LENS. As a result these non-mechanized orders were being reflected as mechanized orders, which caused performance to be understated slightly. With April data, BellSouth will correctly identify the bulk-loaded orders as non-mechanized, which should improve performance by less than 0.5%.
- BellSouth has discovered that certain Records not associated with any CLEC are being improperly included in the CLEC-aggregate results for the ordering measures, even though the Records are not reflected in the CLEC-specific results. With April data, BellSouth will exclude Records that are not associated with any CLEC from the aggregated performance results, which should affect the ordering measures by less than 0.5%.
- BellSouth will implement more specific product identification to assign data to the Line Sharing, and Combo Other categories. In particular, improved product mapping to reflect more types of EELs in the Combo Other category will be implemented. Because of the relatively low historical volumes for these products,

the total relevant impacts with respect to the measures are not quantifiable at this time, will impact all ordering measures for these products.

- The method for identifying whether a FOC or Reject was returned on xDSL orders was changed. The changed coding has uncovered a potential problem with the source data that is still being investigated.

#### **PROVISIONING MEASUREMENTS:**

- The LNP measure Percentage of Time BellSouth Applies the 10-digit Trigger will be modified to include orders written in the prior month when the port is to be done in the current month rather than just reporting volumes in the month wherein the order is received. In addition, BellSouth will implement enhanced coding that will better identify trigger-eligible orders and whether the trigger was properly applied. The aggregate measurement results will be reduced by about 1% as a result of these changes.
- For the Provisioning Troubles in X Days measure, some troubles associated with service orders that contain multiple circuits were not being reflected. BellSouth is implementing a more accurate counting of troubles on orders containing multiple circuits, which is expected to create less than a 1% difference in the overall measurement results.
- Prior to April data, orders that were completed in one month, but the completion notice was sent in another month after the measurement processing window closed were not included in the data. Similarly, where a jeopardy notice occurs in a different month from the due date, the order was not included in the data. Such order will be included effective with April data. These CLEC requested changes will have a minimal impact on results.
- Additional criteria will be utilized to more accurately identify stand-alone LNP orders. Consequently, a small volume of LNP orders that were defaulting to an error bucket will now be captured in the stand-alone LNP product. This change is expected to create a less than 1% increase in the LNP stand-alone base with a minimal impact on measurement results.
- BellSouth will implement more specific product identification to assign data to the Line Sharing, and Combo Other categories. In particular, improved product mapping to reflect more types of EELs in the Combo Other category will be implemented. Because of the relatively low historical volumes for these products, the total relevant impacts with respect to the measures are not quantifiable at this time, although this change will impact all provisioning measures for these products.



- Improved methods will be implemented to assign CLEC resale and retail order volume for ISDN, Centrex, Residential, Business, ADSL, Coin, and PBX lines to SQM categories. The retail order volume in these categories will be affected by less than 2% with a minimal impact on results for the overall measure.

#### **MAINTENANCE AND REPAIR MEASUREMENTS:**

- Some trouble tickets that were formerly defaulting to an error bucket because they could not be associated with a wire center can now be properly associated with a wire center and included in the measures. This change will increase the combined volume of CLEC and retail trouble tickets by less than 1% across the region.
- With April data, there will be an improved means to identify and exclude trouble tickets associated with reports on official BellSouth lines, consistent with the SQM. This change will reduce the retail analog ticket base by less than 0.1% resulting in a minimal impact on measurement results.
- Prior to April data a small number of trouble tickets for a subset of CLEC and retail ISDN products were previously reflected in the Other Design category due to inability of the product mapping routines to properly identify them and assign them to the correct disaggregation for the retail analog. With April data, BellSouth will implement an improved ability to map products to SQM product categories, which will affect less than 1% of the retail and CLEC trouble tickets in the region.
- In the WFA system, the following sequence of events does not result in a repeat trouble being counted when a repeat trouble. That sequence is an actual trouble, followed by a CPE or information trouble ticket, which are excludable trouble tickets for per the SQM, followed by another actual trouble, which was erroneously being excluded from the measure. All three of these trouble tickets would have to arise within the same 30-day period for this issue to arise. Both the retail analogue and CLEC data are understated by less than 0.5%.
- Improved methods will be implemented to assign CLEC resale and retail trouble tickets and lines in service for ISDN, Centrex, Residential, Business, ADSL, Coin, and PBX to SQM product categories. This change will affect the number of trouble tickets and lines in service in these categories by less than 1%.
- With the production of April data, existing circuits with pending service order changes on them will now be reflected in the number of lines in service. Overall, the denominator for Trouble Report Rate metrics will increase by less than 2%, which will slightly improve both retail and wholesale reported performance.

**OTHER MEASUREMENTS:**

- To address Florida Observation 180, BellSouth will make changes to the methodology for service order volumes for the SQM measurement, "Database Update Information: Percent Database Update Accuracy", effective with April data. Currently, the sample of service orders pulled is a subset of "correct" service orders from the Service Order Accuracy measure. Consequently, service orders that were identified as having an error on any part of the order in the service order accuracy review were excluded from the sample for the Database Update Accuracy measure. The error could have been irrelevant to database updates because a large number of fields are checked under the service order accuracy measure. Effective with March completed service orders (April data), BellSouth will include all orders that affect DA, LIDB, or DL on the list of orders to be reviewed regardless of whether or not there is an error on another part of the service order. This issue will have a minimal impact to the data because the service order accuracy rate is so high. In fact, for April data, this change had no impact on reported results
- Consistent with the SQM, BellSouth will implement a coding change to exclude billing associated with KPMG test bed records. This will have a negligible affect on the billing measures.
- Data for end users located in one state and served from a wire center in another state will now be reported in the state where the end user is located. Previously, the data was reported in the state where the wire center was located. This change is consistent with the way that state commissions typically desires to reflect these cross boundary situations. This change will appear as revised data for the states. The largest revisions will appear in Georgia, Tennessee, South Carolina, Alabama, and Mississippi. This will affect both maintenance and provisioning measures.

# **ATTACHMENT 2**

BellSouth Telecommunications, Inc.  
Legal Department  
1025 Lenox Park Boulevard  
Suite 6C01  
Atlanta, GA 30319-5309

bennett.ross@bellsouth.com

Bennett L. Ross  
General Counsel - Georgia

404 986 1718  
Fax 404 986 1800

June 4, 2002

**DELIVERED BY HAND**

Mr. Reece McAlister  
Executive Secretary  
Georgia Public Service Commission  
244 Washington Street, S.W.  
Atlanta, Georgia 30334-5701

Re: *Investigation Into Development of Electronic Interfaces for BellSouth's  
Operations Support Systems; Docket 8354-U*

*Performance Measurements for Telecommunications Interconnection,  
Unbundling and Resale; Docket No. 7892-U*

Dear Mr. McAlister:

As noted in my letter of May 23, 2002, as part of the upgrade to Version 4.0 of its Performance Measurement and Analysis Platform ("PMAP"), BellSouth Telecommunications, Inc. ("BellSouth") is implementing certain changes to the method of calculating its performance measurement results. These changes were described in detail in the Notification Report filed with the Commission on May 23, 2002.

With the upgrade nearly complete and with April performance data expected to be posted on June 5, 2002 using the Version 4.0 platform, BellSouth has identified additional changes that are being made in the calculation of its performance results. These additional changes are outlined in the revised Notification Report, including a description of each change, the reason for the change, and an estimate of the impact of the change, if available.

Enclosed please find an original and eighteen (18) copies, as well as an electronic version, of BellSouth's revised Notification Report, and I would appreciate your filing same and returning the three (3) extra copies stamped "filed" in the enclosed stamped, self-addressed envelopes.

.A

Mr. Reece McAlister  
June 4, 2002  
Page 2

Thank you for your assistance in this regard.

Yours very truly,



Bennett L. Ross

BLR:nvd  
Enclosures

cc: Mr. Leon Bowles (w/enclosure) (via electronic mail)  
Parties of Record (w/enclosure) (via electronic mail)

449557

**PARTIES OF RECORD**  
**Docket No. 8354-U and 7892-U**

Kristy R. Holley, Division Director  
Consumers' Utility Counsel  
47 Trinity Avenue, S.W.  
4<sup>th</sup> Floor  
Atlanta, GA 30334-4600  
404-656-3982 (o)

Charles A. Hudak  
Friend, Hudak & Harris, LLP  
Three Ravinia Drive  
Suite 1450  
Atlanta, GA 30346-2131  
770-399-9500 (o)

Suzanne W. Ockleberry  
AT&T  
1200 Peachtree Street, NE  
Suite 8100  
Atlanta, GA 30309  
404-810-7175 (o)

Charles V. Gerkin Jr.  
Attorney at Law  
Suite 610 – PMB 307  
4135 LaVista Road  
Tucker, GA 30085-5003  
770-414-4206 (o)

Jeremy D. Marcus  
Blumenfeld & Cohen  
[Co-Counsel for Rhythm, aka ACI Corp.]  
1625 Massachusetts Avenue, N.W.  
Suite 300  
Washington, DC 20036  
202-955-6300 (o)

John P. Silk  
Georgia Telephone Association  
1900 Century Boulevard, Suite 8  
Suite 8  
Atlanta, GA 30345  
404-321-5368 (o)

Newton M. Galloway  
Smith, Galloway, Lyndall & Fuchs  
Suite 400 First Union Bank Tower  
100 South Hill Street  
Griffin, GA 30229  
770-233-6230 (o)

John Kerkorian  
Mpower Communications Corp.  
Two Premier Plaza  
5607 Glenridge Drive, Suite 310  
Atlanta, GA 30342  
404-554-1217 (o)

Walt Saprnov  
Gerry & Saprnov, LLP  
Three Ravinia Drive  
Suite 1455  
Atlanta, GA 30346-2131  
770-395-9100 (o)

Frank B. Strickland  
Strickland Brockington & Lewis  
[Counsel for e.spire]  
Midtown Proscenium – Suite 1200  
1170 Peachtree Street, N.E.  
Atlanta, GA 30309  
404-885-5741 (o)

William Bradley Carver  
Alston & Bird LLP  
One Atlantic Center  
1201 West Peachtree Street  
Atlanta, GA 30309-3424  
404-881-7000 (o)

Daniel S. Walsh  
Attorney General Office  
Department of Law—State of Georgia  
40 Capitol Square, S.W.  
Atlanta, GA 30334-1330  
404-657-2204 (o)

Eric J. Branfman  
Richard M. Rindler  
Swidler & Berlin  
3000 K Street, NW, Suite 300  
Washington, DC 20007  
202-945-6940 (o)

Robert A. Ganton  
Regulatory Law Office  
Dept. Army  
Suite 700  
901 N. Stuart Street  
Arlington, VA 22203-1837  
703-696-1645 (o)

Peter C. Canfield  
Dow Lohnes & Albertson  
One Ravinia Drive, Suite 1600  
Atlanta, GA 30346  
770-901-8800 (o)

James M. Tennant  
Low Tech Designs, Inc.  
1204 Saville Street  
Georgetown, SC 29440  
803-527-4485 (o)

Jeffrey Blumenfeld  
Elise P. W. Kiely  
Blumenfeld & Cohen  
1625 Massachusetts Avenue, N.W.  
Suite 300  
Washington, DC 20036  
202-955-6300 (o)

Anne E. Franklin  
Arnall Golden & Gregory, LLP  
[Counsel for Broadslate, NorthPointe]  
2800 One Atlantic Center  
1201 West Peachtree Street  
Atlanta, GA 30309  
404-873-8536 (o)

Harris R. Anthony  
BellSouth Long Distance  
400 Perimeter Center Terrace  
Suite 350 – North Terraces  
Atlanta, GA 30346  
(770) 352-3116 (o)

Charles F. Palmer  
Troutman Sanders LLP  
5200 NationsBank Plaza  
600 Peachtree Street, NE  
Atlanta, GA 30308-2216  
404-885-3402 (o)

Judith A. Holiber  
Morgenstein & Jubelirer  
One Market  
Spear Street Tower, 32nd Floor  
San Francisco, CA 94105  
415-901-8700 (o)

Nanette S. Edwards  
Regulatory Attorney  
ITC^DeltaCom  
4092 S. Memorial Parkway  
Huntsville, AL 35802  
256-382-3856 (o)

James A. Schendt  
Regulatory Affairs Manager  
Interpath Communications, Inc.  
P. O. box 13961  
Durham, NC 27709-3961  
919-253-6265 (o)

William R. Atkinson  
Sprint Communications Company L.P.  
3100 Cumberland Circle  
Mailstop GAATLN0802  
Atlanta, GA 30339  
404-649-6221 (o)

D. Mark Baxter  
Thomas M. Browder, III  
Stone & Baxter, LLP  
577 Mulberry Street  
Suite 1111  
Macon, GA 31201  
478-750-9898 (o)

David I. Adelman, Esquire  
Charles B. Jones III, Esquire  
C. Christopher Hagy, Esquire  
Hayley B. Riddle, Esquire  
Sutherland, Asbill & Brennan LLP  
999 Peachtree Street, NE  
Atlanta, GA 30309-3996  
(404) 853-8206 (o)  
[Counsel for ITC^DeltaCom, WorldCom]

Genevieve Morelli  
Andrew M. Klein  
Kelley Drye & Warren LLP  
[Counsel for KMC Telecom]  
1200 Nineteenth Street, N.W.  
Washington, DC 20036  
202-877-1257 (o)

Mark M. Middleton, Esquire  
Mark M. Middleton, P.C.  
350 Parkway Lane  
Norcross, GA 30092  
404-806-0808 (o)  
[Counsel for CTAG]



## **REVISED APRIL DATA NOTIFICATION**

As part of the upgrade to Version 4.0 of BellSouth's Performance Measurement and Analysis Platform ("PMAP"), which is used to generate the performance reports filed with the Commission, BellSouth will be implementing certain changes to the method of calculating its performance measurement results. These changes, described below, will be included in PMAP Version 4.0, which will be used to generate results for the April data month, which will be posted on June 5, 2002. BellSouth provides this notice to the CLECs and the Commission pursuant to the state commissions' desire that BellSouth provide written notice of any proposed changes to the method of calculating any performance measurement prior to such changes being implemented. At such time as a state commission implements a formal notification process, BellSouth will comply with that process. All impacts are stated at the measurement, as opposed to sub-metric level unless otherwise stated.

### **ORDERING MEASUREMENTS:**

- In previous months, a discrepancy in Reject Interval and Firm Order Confirmation ("FOC") Timeliness performance was caused by the fact that some of BellSouth's systems are on Eastern Time, and some are on Central Time, and that the normalized OSS downtime exclusion had not been implemented for xDSL orders. As a result, BellSouth's performance was being understated. In response to exception to FL exception 36, Partially Mechanized orders that are both received and responded to during LCSC off hours will show a response time of 1 minute instead of 0. With April 2002 data, BellSouth is fixing both of these issues, which should increase reported performance by 1-3% for Reject Interval and a negligible amount for FOC Timeliness.
- When a CLEC sends a large volume of nearly identical orders via fax to the Local Carrier Service Center ("LCSC"), the service representative may bulk load those orders via LENS. As a result these non-mechanized orders were being reflected as mechanized orders, which caused performance to be understated slightly. With April data, BellSouth will correctly identify the bulk-loaded orders as non-mechanized, which should improve performance by less than 0.5%.
- BellSouth has discovered that certain Records not associated with any CLEC are being improperly included in the CLEC-aggregate results for the ordering measures, even though the Records are not reflected in the CLEC-specific results. With April data, BellSouth will exclude Records that are not associated with any CLEC from the aggregated performance results, which should affect the ordering measures by less than 0.5%. Additionally, BellSouth has discovered that certain data produced via Barney which are LNP and xDSL partially mechanized orders submitted by CLECs with Company Codes beginning with a leading "0" were being excluded from the results. With the implementation of April data, these records will be included in the ordering results.

- BellSouth will implement more specific product identification to assign data to the Line Sharing, Other Non-Design, XDSL, and Combo Other categories. In particular, improved product mapping to reflect more types of EELs in the Combo Other category will be implemented. These changes will address FL exception 114/120. Because of the relatively low historical volumes for these products, the total relevant impacts with respect to the measures are not quantifiable at this time, will impact all ordering measures for these products.
- The method for identifying whether a FOC or Reject was returned on xDSL orders was changed which affected the FOC/Reject Completeness measure. The changed coding has uncovered a potential problem with the source data that is still being investigated.
- The methodology used to identify Rejected Service Orders was revised. The revised method uncovered an error in the source system feed that will now result in about 2% fewer rejects being identified until the source data is corrected. This issue, which arose with April data, will affect Resale, UNE Loop without LNP, and Loop/Port Combo categories.

#### **PROVISIONING MEASUREMENTS:**

- The LNP measure Percentage of Time BellSouth Applies the 10-digit Trigger will be modified to include orders written in the prior month when the port is to be done in the current month rather than just reporting volumes in the month wherein the order is received. In addition, BellSouth will implement enhanced coding that will better identify trigger-eligible orders and whether the trigger was properly applied. The aggregate measurement results will be reduced by about 1% as a result of these changes.
- For the Provisioning Troubles in X Days measure, some troubles associated with service orders that contain multiple circuits were not being reflected. BellSouth is implementing a more accurate counting of troubles on orders containing multiple circuits.. Additionally with this change, BellSouth will be correcting a scenario where a single trouble ticket was being associated with multiple service orders during the reporting period and BellSouth will be implementing a change to the measure involving a coding change to improve trouble ticket association with completed service orders. These changes are expected to create less than a 1% difference in the overall measurement results.
- Prior to April data, orders that were completed in one month, but the completion notice was sent in another month after the measurement processing window closed were not included in the data. Similarly, where a jeopardy notice occurs in a different month from the due date, the order was not included in the data. Such order will be included effective with April data. These CLEC requested changes will have a minimal impact on results.

- Additional criteria will be utilized to more accurately identify stand-alone LNP orders. Consequently, a small volume of LNP orders that were defaulting to an error bucket will now be captured in the stand-alone LNP product. This change is expected to create a less than 1% increase in the LNP stand-alone base with a minimal impact on measurement results.
- BellSouth will implement more specific product identification to assign data to the Line Sharing, Other Non-Design, Other Design, XDSL, ISDN, Local Interconnection Trunks, and Combo Other categories. In particular, improved product mapping to reflect more types of EELs in the Combo Other category will be implemented. Because of the relatively low historical volumes for these products, the total relevant impacts with respect to the measures are not quantifiable at this time, although this change will impact all provisioning measures for these products.
- Improved methods will be implemented to assign CLEC resale and retail order volume for ISDN, Centrex, Residential, Business, ADSL, Coin, and PBX lines to SQM categories. The retail order volume in these categories will be affected by less than 2% with a minimal impact on results for the overall measure.
- In certain rare situations on both BellSouth retail and CLEC orders, SOCS may generate duplicate service order numbers in the same month. When this situation occurs, only the most recent service order was appearing in the measurement data. This problem was corrected and found to occur on only 0.1% to 0.5% of the CLEC and BellSouth retail orders and found to have minimal impact upon the measurement results.

#### **MAINTENANCE AND REPAIR MEASUREMENTS:**

- Some trouble tickets that were formerly defaulting to an error bucket because they could not be associated with a wire center can now be properly associated with a wire center and included in the measures. This change will increase the combined volume of CLEC and retail trouble tickets by less than 1% across the region.
- With April data, there will be an improved means to identify and exclude trouble tickets associated with reports on official BellSouth lines, consistent with the SQM. This change will reduce the retail analog ticket base by less than 0.1% resulting in a minimal impact on measurement results.
- Prior to April data a small number of trouble tickets for a subset of CLEC and retail ISDN products were previously reflected in the Other Design category due to inability of the product mapping routines to properly identify them and assign them to the correct disaggregation for the retail analog. With April data, BellSouth will implement an improved ability to map products to SQM product

categories, which will affect less than 1% of the retail and CLEC trouble tickets in the region.

- In the WFA system, the following sequence of events does not result in a repeat trouble being counted when a repeat trouble. That sequence is an actual trouble, followed by a CPE or information trouble ticket, which are excludable trouble tickets for per the SQM, followed by another actual trouble, which was erroneously being excluded from the measure. All three of these trouble tickets would have to arise within the same 30-day period for this issue to arise. Both the retail analogue and CLEC data are understated by less than 0.5%.
- Improved methods will be implemented to assign CLEC resale and retail trouble tickets and lines in service for ISDN, Centrex, Residential, Business, ADSL, Coin, Other Non-Design, Other Design, and PBX to SQM product categories. This change will affect the number of trouble tickets and lines in service in these categories by less than 1%.
- With the production of April data, existing circuits with pending service order changes on them will now be reflected in the number of lines in service. Overall, the denominator for Trouble Report Rate metrics will increase by less than 2%, which will slightly improve both retail and wholesale reported performance.
- With the production of April data, BellSouth will implement a correction to the coding for measures in which BellSouth DSL is the retail analogue to exclude ADSL lines that do not have BellSouth as the designated Internet Service Provider. This correction will reduce the line counts for the BellSouth analogue for the Customer Trouble Report Rate measure. This measurement result is impacted by about 0.1%.

#### **OTHER MEASUREMENTS:**

- To address Florida Observation 180, BellSouth will make changes to the methodology for service order volumes for the SQM measurement, "Database Update Information: Percent Database Update Accuracy", effective with April data. Currently, the sample of service orders pulled is a subset of "correct" service orders from the Service Order Accuracy measure. Consequently, service orders that were identified as having an error on any part of the order in the service order accuracy review were excluded from the sample for the Database Update Accuracy measure. The error could have been irrelevant to database updates because a large number of fields are checked under the service order accuracy measure. Effective with March completed service orders (April data), BellSouth will include all orders that affect DA, LIDB, or DL on the list of orders to be reviewed regardless of whether or not there is an error on another part of the service order. This issue will have a minimal impact to the data because the

service order accuracy rate is so high. In fact, for April data, this change had no impact on reported results

- Consistent with the SQM, BellSouth will implement a coding change to exclude billing associated with KPMG test bed records. This will have a negligible affect on the billing measures.
- Data for end users located in one state and served from a wire center in another state will now be reported in the state where the end user is located. Previously, the data was reported in the state where the wire center was located. This change is consistent with the way that state commissions typically desires to reflect these cross boundary situations. This change will appear as revised data for the states. The largest revisions will appear in Georgia, Tennessee, South Carolina, Alabama, and Mississippi. This will affect both maintenance and provisioning measures.
- There was a coding error that incorrectly included certain records such as official trunks or trunks when the owner cannot be identified in the Retail data for Trunk Group Performance. This was corrected with the April release.

# **ATTACHMENT 3**

## **Confidential**

**ATTACHMENT 4**  
**Confidential**

# **ATTACHMENT 5**



May 17, 2002

VIA FACSIMILE AND MAIL

Jim Schenk  
BellSouth Telecommunications, Inc.  
600 North 19th Street  
8th Floor  
Birmingham, Alabama 35203

RE: BellSouth's Responsiveness to Performance Measures Questions

Dear Jim:

The purpose of this letter is to address the continuing inadequacy and lengthy delays of BellSouth's responses to performance measurement issues initiated by AT&T.

Prior to January, 2002, AT&T filtered all performance measurement questions and data integrity issues through the AT&T BellSouth Account Team. During 2000 and 2001 AT&T experienced lengthy delays on BellSouth responses to AT&T inquiries. For example, during the last half of 2000 it took an average of almost 6 weeks to respond to data integrity questions raised by AT&T. In 2001 the average length of time that AT&T waited on responses from the BellSouth Account Team increased to over 7 weeks with one response taking 24 weeks.

In January of this year BellSouth reorganized its support of CLECs. The new CLEC Care organization directed AT&T to send all future performance measurement related questions and concerns to the BellSouth PMAP team. Since then, AT&T has been sending data integrity questions and requests for root cause analysis of the performance data to Phil Porter, Manager - CLEC Interface Performance Measures. While BellSouth promptly responded to some initial simple performance questions posed by AT&T, Phil Porter indicated in March that all future responses from his team are to be filtered through BellSouth's External Response Team (ERT). Since that time, BellSouth's responses have been untimely and the less than substantive.

In Attachment 1 you will find the chronology of an AT&T Broadband data integrity issue that was initiated on February 12, 2002 by E.D. Charles Analytics on behalf of AT&T. More than three months has passed and AT&T still has not received a satisfactory explanation from BellSouth that answers the original data integrity

questions. BellSouth responded to AT&T's initial questions after only two days, since the response did not follow BellSouth's ERT process. While the document that BellSouth provided was somewhat helpful, it contained some incorrect information and did not adequately address all of AT&T's issues. E.D. Charles Analytics then followed up with clarifying questions to BellSouth on February 20, 2002. Over 8 weeks passed before a response was received from BellSouth. The second response was grossly inadequate. On May 10, 2002, E.D. Charles Analytics replied to BellSouth reiterating the questions that had not been answered sufficiently and expressing disappointment in the quality of the answers provided by BellSouth given the lengthy response time. On May 21, 2002, Phil Porter wrote, "it is not possible for BellSouth to provide 'an estimate of the date when BellSouth will provide a complete and detailed response' to [E.D. Charles Analytics] May 10, 2002, letter."

This AT&T Broadband data integrity issue is just one example of the lengthy delays and inadequate responses consistently experienced by AT&T during the past two years. Despite a new BellSouth interface for performance measurement issues, AT&T continues to struggle to get accurate and timely answers to data integrity and performance questions. I believe BellSouth would agree that the process of providing AT&T with sufficient and timely responses is not working. I am requesting your involvement to get AT&T prompt, substantive and complete answers to the long outstanding issues described above. Additionally, please advise AT&T of what BellSouth is doing to improve the quality and timeliness of responses to CLEC performance measurement issues.

Sincerely,

cc: Greg Terry

# **ATTACHMENT 6**



**BellSouth Telecommunications, Inc.**  
**Interconnection Services Operations**  
675 West Peachtree Street, N.E.  
Suite 3F42  
Atlanta, GA 30375

**Philip W. Porter**  
Manager  
404-927-2182  
Phillip.Porter@bellsouth.com

May 21, 2002

Mr. E. D. Charles  
Analyst, E. D. Charles Analytics  
7000 Sweet Creek Rd.  
Duluth, GA 30097

Dear Don:

Pursuant to your arrangement with AT&T and with the express authorization of K.C. Timmons of AT&T, BellSouth hereby acknowledges receipt of your May 10, 2002 letter concerning the Local Number Portability (LNP) Flow Through Comparisons with Miscellaneous Reports. BellSouth is in the process of investigating the substantive issues you have raised and will provide you with a response upon completion of the investigation. In the meantime, I wanted to address your "disappointment" in the timeliness and thoroughness of BellSouth's prior response and your "expectations" about future responses from BellSouth.

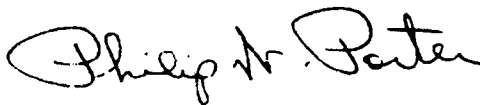
BellSouth endeavors to respond to questions raised about performance measurement data as promptly as possible. However, the issues you have raised are not the only performance measurement issues raised by AT&T. In fact, BellSouth has devoted substantial time and effort in responding to allegations about BellSouth's performance data asserted by AT&T on a variety of fronts, including allegations before the Federal Communications Commission; allegations before various state public service commission proceedings in BellSouth's region; and in response to a multitude of letters from AT&T representatives. BellSouth will continue to respond to all of AT&T's and its agents requests in as timely a fashion as possible.

With respect to your "expectations" about the substance of future responses from BellSouth, our goal is to answer the questions you have asked. If you ask for underlying data or if such data is necessary to adequately answer your questions, BellSouth will provide it, assuming the data is reasonably available or is not otherwise available to AT&T through the variety of systems and databases available to AT&T. Because the effort required to answer questions concerning performance measurements data can vary considerably, it is not possible for BellSouth to provide "an estimate of the date when BellSouth will provide a complete and detailed response" to your May 10, 2002

letter. BellSouth will endeavor to provide a substantive response as quickly as possible, and I will provide you with periodic updates as to our progress.

Thank you again for your letter, and please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in cursive script that reads "Philip W. Porter". The signature is written in dark ink and is positioned above the printed name.

Philip W. Porter

Cc: B. Ross  
J. Gordon

# **ATTACHMENT 7**



**BellSouth Telecommunications, Inc.**  
**Interconnection Services Operations**  
675 West Peachtree Street, N.E.  
Suite 3F42  
Atlanta, GA 30375

**Phillip W. Porter**  
Manager  
404-927-2182  
Phillip.Porter@bellsouth.com

June 17, 2002

Ms. Denise Berger  
AT&T  
Room 12256  
1200 Peachtree St. NE  
Atlanta, GA 30309

Dear Denise:

This is in response to your letter dated May 17, 2002, to Jim Schenk regarding your concerns relative to BellSouth's responsiveness to Performance Measures questions. Mr. Schenk requested that I respond to your request. As I stated in my March 15, 2002 letter to you, the CLEC Interface Group is the point of contact for issues associated with BellSouth's performance data and AT&T's Performance Measurement Analysis Platform (PMAP) reports, and, therefore, your questions or concerns regarding the responsiveness to AT&T's inquiries should be addressed to me and escalated to my Director, Becky Hazelwood.

I would like to discuss the processes that BellSouth used in handling the specific issue brought to us by AT&T consultant, E. D. Charles from E. D. Charles Analytics.

Mr. Charles submitted an e-mail to us on February 12, 2002, requesting "an understanding of why different PMAP reports, which purport to contain counts of Local Number Portability (LNP) Local Service Requests (LSR) for a given month, often show very different results." Our initial response of February 14, 2002 contained some outdated information that we corrected in a subsequent reply. The major focus of our response was to explain, as we have with AT&T in the past, that attempts to compare data points on the various reports are futile since different exclusions and business rules apply to each report. All PMAP users should review the Raw Data User Manual (RDUM) and Service Quality Measurement Plan (SQM) to ascertain the differences in the business rules to understand why differences exist in order totals for each report.

Mr. Charles' February 20, 2002 e-mail, which was in response to BellSouth's February 14, 2002 e-mail, provided the requested supporting data files and clarified many of the issues that he initially addressed. BellSouth's April 22, 2002 letter to Mr. Charles thoroughly addressed every question that had been posed by Mr. Charles.

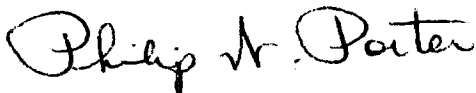
BellSouth received another email from Mr. Charles on March 26, 2002, asking essentially the same questions that were in his February 12 and February 20, 2002

emails. BellSouth's May 8, 2002 response again explained that he should not expect a match for the files that he is comparing due to the differences in business rules as outlined in the PMAP documents available for CLECs to understand the report formats.

BellSouth received another letter from Mr. Charles dated May 10, 2002, requesting essentially the same information that BellSouth had previously provided in its April 22, 2002 letter. I sent an interim response to Mr. Charles on May 21, 2002, advising that BellSouth would further investigate the issues and provide him with a response upon completion of the investigation. I also addressed his "disappointment" in the timelines and thoroughness of BellSouth's prior response as well as his "expectations" about future responses from BellSouth.

Even though BellSouth is committed to providing all its CLEC customers with PMAP support and answers to issues raised, it is essential that the CLECs have a thorough understanding of the report formats as ordered by the various state commissions. It is necessary for AT&T and its consultants to use the documents available to them to assist them in their efforts to understand the reports. BellSouth wants to assist all CLECs in answering questions and addressing issues that are brought to BellSouth, but a continual rehashing of the same issues time after time is unproductive.

Sincerely,

A handwritten signature in cursive script that reads "Philip W. Porter". The signature is written in dark ink and is positioned above the printed name.

Philip W. Porter

Cc: Bennett Ross  
Jay Gordon



# **ATTACHMENT 8**

June 25, 2002

VIA FACSIMILE AND MAIL

Phillip W. Porter  
Manager  
BellSouth Telecommunications, Inc.  
Interconnection Operations  
675 West Peachtree Street, N.E.  
Suite 3F42  
Atlanta, Georgia 30375

RE: BellSouth's Responsiveness to Performance Measures Questions

Dear Phil:

This is in response to BellSouth's June 17, 2002, letter concerning BellSouth's responsiveness to AT&T's Performance Measures questions. BellSouth's letter is disturbing, not only because the facts asserted by BellSouth are not correct, but also because it is becoming increasingly clear that, no matter how much BellSouth contends to the contrary, BellSouth does not want to engage in meaningful and constructive analysis of performance data.

The single piece of useful information in your letter was the direction to escalate to Becky Hazelwood on performance measures and root cause analysis. This is the first time that AT&T has been given this direction and information. Prior to this notice, AT&T had been directed to take our concerns to our CLEC Care contacts.

Surprisingly, BellSouth asserts that it has answered AT&T's questions. Contrary to these assertions, comprehensive reading of the correspondence makes it quite obvious that AT&T's questions have never been answered, despite repeated attempts by AT&T. It is simply incorrect to suggest that AT&T is asking questions to which it has already received sufficient answers. BellSouth's "answers" are woefully inadequate. AT&T has asked very specific questions, involving very specific data sets. BellSouth's answers, in turn, have been general in nature, sometimes only alluding to "differences in business rules" as the reason for the discrepancies, while giving no reference to specific business rules. To use a simple, but applicable, analogy, AT&T asked, "What time is it?" BellSouth answered, "Daytime." This is simply not an adequate or usable response.

Further, BellSouth June 17, 2002, letter states, "AT&T should use the documents available to them to assist them in their efforts to understand the reports." I believe that BellSouth is well aware that AT&T routinely uses all reports available to them. Not only does AT&T use these reports as support documents during its examination of data, AT&T understands these reports and understands how to apply each report to its corresponding analysis. However, BellSouth's reports are frequently insufficient to answer AT&T's questions. Based on the insufficiency of data in BellSouth's reports, AT&T asked that BellSouth investigate certain pieces of data. Had the reports been sufficient, AT&T would have no need to ask questions and make requests for investigations in to the data. Finally, none of BellSouth's responses directed AT&T to any published documentation as the source for answers to AT&T's questions.

In ¶19 of its Order approving BellSouth's Georgia and Louisiana 271 application just last month, the FCC cited BellSouth's "readiness to engage in data reconciliations". AT&T's request is that BellSouth follow through on that promise: engage in such data reconciliation as BellSouth persuaded the FCC that it stands ready to do.

As this exchange of letters has obviously not been productive for AT&T, I am requesting a meeting between Becky Hazelwood and me, along with the appropriate SMEs, to review BellSouth's PON-specific reconciliation of the BellSouth data and the data AT&T has provided to BellSouth. This meeting should take place no later than July 12, 2002. Additionally, BellSouth should plan to respond to the requests made by KC Timmons on May 28, 2002, and May 29, 2002, at the same meeting.

I will look forward to hearing from Becky Hazelwood by week's end to arrange this meeting. I can be reached at 404/810-8644.

Sincerely,

cc: Greg Terry  
J. Schenk  
B. Hazelwood  
B. Ross

# **ATTACHMENT 9**

## **Confidential**

# **ATTACHMENT 10**

## Norris, Sharon - LGA

---

**From:** Timmons, King C (K.C.), NCAM on behalf of Timmons, King C (K.C.) - NCAM  
**Sent:** Wednesday, May 29, 2002 4:28 PM  
**To:** Norris, Sharon - LGA  
**Subject:** FW: Average Completion Notice Interval Issue

-----Original Message-----

**From:** Timmons, King C (K.C.), NCAM  
**Sent:** Wednesday, May 29, 2002 3:58 PM  
**To:** 'Phillip Porter - BellSouth'  
**Subject:** Average Completion Notice Interval Issue

Phil,

I have a few questions concerning the March Average Completion Notice Interval (ACNI) raw data. Attached is the ACNI raw data file after documented exclusions have been made. As you can see in the raw data file, I have added a new column (column B) that indicates if the SO\_NBR from the ACNI file is also present in the March Order Completion Interval (OCI) raw data file. The ACNI raw data file contains 10,307 non-trunk completion notices for orders that completed in March. Since these completion notices are for orders that completed in March, then I would also expect to see these same SO\_NBRs in the March OCI raw data file. However, there are 4,174 completion notices that do not have a corresponding SO\_NBR or PON in the OCI raw data. My specific questions are as follows:

1. Are there documented business rules that would explain why these 4,174 completion notices are not in the March OCI raw data?
2. If so, can BellSouth list the specific business rules and account for each of the 4,174 completion notices that are not present in the OCI raw data?
3. If there are no documented business rules that would explain this discrepancy, then why are the completion notices reported in the ACNI raw data missing corresponding completions in the OCI raw data?



March 02 ACNI Raw  
Data.xls

Thanks in advance for your attention on this potential data integrity issue. Please call me if you have any questions about the data I am providing.

**KC Timmons**  
Manager Supplier Performance Measurements  
AT&T Local Services - Southern Region  
Phone: 404-810-3914  
Pager: 1-888-858-7243 Pin: 115394  
Fax: 281-664-3671  
e-mail: ktimmons@att.com

# **ATTACHMENT 11**

REQUEST: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the Interrogatory with which that person assisted.

RESPONSE:

John Ruscilli, Data Request – 2  
Clyde Greene, Data Request – 3, Supplemental Items 5, 6, Data Request 13, 14, 56  
Richard McIntire, Data Request – 3, Supplemental Items 5, 6  
Al Varner, Data Request – 3, Supplemental Items 16-18, Data Request 15-19, 21- 39, 43, 47  
Ron Pate, Data Request – 4, Supplemental Item 22, Data Request 9, 11, 43, 44, 48, 58, 67, 96, 101 – 104,  
Theresia Gentry, Data Request – 4, Supplemental Item 23, Data Request 13, 14, 40, 41, 42, 49, 50, 51, 92-95  
Tommy Williams, Data Request – 4, Supplemental Item 69, Data Request 53  
Eric Fogle, Data Request – 4, Supplemental Item 87, Data Request 61-63, 86 – 89, 97 – 100,  
Steve Bigelow, Data Request – 5  
Eugene Glenn, Data Request – 5  
Ron Hilyer, Data Request – 6, 45  
Mike Zier, Data Request – 7  
Lynne Brewer, Data Request – 8, 60  
Steve Martin, Data Request – 8  
Dennis Davis, Data Request – 10, 11, 12  
Barbara Paris, Data Request – 13, 14  
Marcia Foshee-Duffy, Data Request – 13, 14  
Brad Coleman, Data Request – 20  
Amanda Butler, Data Request – 40, 41, 42  
Scott Woolard, Data Request – 50  
Steve Vanderburg, Data Request – 51  
Reg Starks, Data Request – 52  
Bill McAllister, Data Request - 54



RESPONSE (continued):

Gary Dennis, Data Request – 46  
Linda Tate, Data Request - 46  
Jeff McKinney, Data Request – 55, 65, 66, 91  
Eddie Owens, Data Request – 57, 59, 91  
Robert McKnight, Data Request - 64  
Dave Coon, Data Request – 58  
Greg Follensbee, Data Request – 67  
Shane Ragland, Data Request – 68-71,  
Nicole McCarthy, Data Request – 68-70,  
Conrad Ponder, Data Request – 72, 73, 105  
Tamara Schoech, Data Request – 72  
S. Meyer Fletcher, Data Request – 73  
Keith Milner, Data Request – 74  
Alan Tarr, Data Request – 75-77  
Linda Byrd, Data Request – 75-77  
Ty Taylor, Data Request – 78 – 85  
Mike Zitzmann, Data Request - 90  
Kathy Sager, Data Request 105  
Laura Verdier, Data Request 105  
George Darden, Data Request 105  
Kenney Blackburn, Data Request 106 - 108

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
Consolidated CLEC 1<sup>st</sup> Data Requests  
May 23, 2002  
Item No. 2  
Page 1 of 1

**REQUEST:** Please identify the individual who is best able to provide information on the existence and extent of competition for local service in Tennessee.

**RESPONSE:** John A. Ruscilli

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
Consolidated CLEC 1<sup>st</sup> Data Requests  
May 23, 2002  
Item No. 3  
Page 1 of 1

REQUEST: Please provide supplemental responses to covering the period July 1, 2001 to April 30, 2002, to Interrogatories Nos. 5, 6, 16, 17, and 18, from AT&T, SECCA, Brooks Fiber, MCImetro, WorldCom, Time Warner, XO Tennessee, and Covad which were served on August 21, 2001.

RESPONSE: See attached.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
Consolidated CLEC 1<sup>st</sup> Data Requests  
May 23, 2002  
Item No. 3  
ATTACHMENTS

REQUEST: Provide, by quarter, the total number of minutes exchanged with CLECs from 1996 to the present.

SUPPLEMENTAL RESPONSE COVERING THE PERIOD OCTOBER 1, 2001 TO APRIL 30, 2002.

Month	CLEC ORIGINATED MINUTES IN TN
08/01	81,933,488
09/01	80,923,075
10/01	76,751,509
11/01	77,403,890
12/01	77,542,330
01/02	87,196,715
02/02	105,081,770
03/02	94,198,238
04/02	102,345,839

Tennessee BellSouth Originated MOUs

July - Sept 01	3,100,932,456
Oct - Dec 01	3,300,843,152
Jan - Mar 02	3,630,999,043
April 02	1,184,999,043

- REQUEST: For each of the past five years, provide the number of minutes interchanged between BellSouth and CMRS networks in Tennessee. Separately identify:
- a. The number of minutes originating with CMRS customers and terminating with BellSouth.
  - b. The number of minutes originating with BellSouth and terminating on CMRS networks.

SUPPLEMENTAL RESPONSE COVERING THE PERIOD OCTOBER 1, 2001 TO APRIL 30, 2002.

Month	CMRS ORIGINATED MINUTES IN TN
08/01	245,273,991
09/01	262,509,480
10/01	310,901,701
11/01	264,494,338
12/01	264,398,598
01/02	328,171,211
02/02	280,363,432
03/02	279,257,298
04/02	356,953,580

MOUs BellSouth Originated CMRS Terminated (Tennessee)

1999	461,433,798
2000	1,111,005,421
2001	1,307,224,281
2002 thru April 30	624,342,066

REQUEST: For the months of January 2001 through July 2001, please state, by month, the percentage of coordinated cutovers that involved IDLC in Tennessee and in each of the other states in BellSouth's region.

SUPPLEMENTAL RESPONSE COVERING THE PERIOD OCTOBER 1, 2001 TO APRIL 30, 2002.

The systems in which the requested information is retained, only retains this type of information for 60 days. Consequently, the data for August 2001 through March 2002 is not currently in BellSouth's possession, custody or control. In BellSouth's previous work effort, BellSouth manually reviewed every order involving Coordinated Cutovers for these months in all nine states to identify whether IDLC was involved.

BellSouth is currently manually compiling the data for the percentage of coordinated cutovers that involved IDLC in Tennessee and in each of the other states in BellSouth's region. Below is a table summarizing the data for coordinated cutovers that involved IDLC in each of the other states in BellSouth's region for the months available.

STATE		
	7/01	04/02
AL	9.4%	
GA	15.4%	
KY	50%	
LA	4.6%	
MS	15%	
NC / SC	26.5%	
FL	40.5%	
TN	19.1%	
AL	4.6%	

**REQUEST:** For the months of January 2001 through July 2001, please state the number and percentage of coordinated customer conversion service orders involving IDLC in Tennessee and in each of the other states in BellSouth's region for which BellSouth failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measure.

**SUPPLEMENTAL RESPONSE COVERING THE PERIOD OCTOBER 1, 2001 TO APRIL 30, 2002.**

The systems, in which the requested information is retained, only retains this type of information for 60 days. Consequently, the data for August 2001 through March 2002 is not currently in BellSouth's possession, custody or control. The only responsive information that remains in BellSouth's possession is for the month of April 2002. BellSouth is currently manually reviewing every order involving Coordinated Cutovers for these months in TN and the remaining states to identify whether IDLC was involved and, where IDLC was involved, the time where BellSouth failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measurement.

In July 2001, all states in BellSouth met the Coordinated Hot Cut Timeliness % Within Interval Measure.



REQUEST: Beginning with January 1, 2001, provide the service order accuracy rate for CLEC orders and the service order accuracy rate for BellSouth's retail operation for Tennessee and in each of the other states in BellSouth's region. For purposes of this interrogatory, "service order accuracy rate" with respect to CLEC orders is defined as the percentage of service orders for CLECs that were processed by BellSouth exactly as they were ordered or prepared by the CLECs.

SUPPLEMENTAL RESPONSE COVERING THE PERIOD OCTOBER 1, 2001 TO APRIL 30, 2002.

BellSouth produces a Service Order Accuracy Report as ordered by the GA PSC. Beginning with the November 2001 report, BellSouth began publishing a Regional Service Order Accuracy report. Prior to November 2001 data month there were specific reports for Florida, Georgia, and Kentucky based on service order samples from those states. The data for these three states was used to derive an average accuracy rate for the other states.

Service Order Accuracy rates with respect to Resale Residence CLEC non-dispatched orders, < 10 circuits orders as reported by BellSouth are attached below:

	July 01	Aug 01	Sept 01	Oct 01	Nov 01	Dec 01	Jan 02	Feb 02	Mar 02	Apr 02
<b>GA</b>	87.50%	77.78%	94.30%	100%	-	-	-	-	-	-
<b>FL</b>	95.15%	96.97%	96.34%	98.94%	-	-	-	-	-	-
<b>NC</b>	86.67%	87.83%	95.49%	99.27%	-	-	-	-	-	-
<b>SC</b>	86.67%	87.83%	95.49%	99.27%	-	-	-	-	-	-
<b>TN</b>	86.67%	87.83%	95.49%	99.27%	-	-	-	-	-	-
<b>KY</b>	72.16%	89.67%	96.79%	98.86%	-	-	-	-	-	-
<b>LA</b>	86.67%	87.83%	95.49%	99.27%	-	-	-	-	-	-
<b>AL</b>	86.67%	87.83%	95.49%	99.27%	-	-	-	-	-	-
<b>Region</b>					96.43%	100%	97.33%	98.67%	95.38%	94.29%

RESPONSE: (Cont.)

Beginning with November data, BellSouth changed certain aspects of the Service Order Accuracy methodology to provide a more accurate representation of its performance consistent with the required disaggregations in the SQM. In order to increase the likelihood of a statistically valid sample for each submetric, BellSouth has made the measure regional. In addition, there were certain other aspects of the measure that required modification as set forth below:

BellSouth's Service Order Accuracy measurement was based on an evaluation of all service orders ("SOs") generated by the LSRs associated with the originally sampled SOs. Thus, the volumes reflected on the MSS represented the volume of LSRs, not SOs.

Statistically valid samples of SOs were selected based on product groups, <10 circuits vs. >10 circuits, and mechanized vs. non-mechanized. The dispatch vs. non-dispatch levels of disaggregation were not statistically valid because this criteria was not a factor in sampling;

Starting with November 2001 data, BellSouth changed the measurement to improve the statistical validity of the sample; more precisely assess the accuracy of SOs; include all of the 24 sub-metrics; address existing product gaps; and reflect the regionality of BellSouth's OSS and work centers.

To effectuate these changes, BellSouth made the following modifications to the calculation of the measure: first, BellSouth calculated the measure based on a nine state aggregate sample; second, BellSouth refocused the measurement to include only sampled SOs; third, BellSouth expanded the sampling methodology to sample from all 24 sub-metric categories; and fourth, BellSouth included all product offerings in the data universe. The result of these changes is that BellSouth has a more precise and accurate measure. Prior to November data, the measurement tended to understate performance, primarily due to the omission of mechanized UNE-P and the process of evaluating all SOs associated with a particular LSR.

The increased volume due to the nine-state aggregate used to calculate the measure for November data forward enhances ability of the measure to reflect the performance of the regional ordering systems; the sample methodology adheres to the intent of the SQM; it is valid for all 24 sub-metrics; and it reflects all product offerings.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
Consolidated CLEC 1<sup>st</sup> Data Requests  
May 23, 2002  
Item No. 4  
Page 1 of 1

**REQUEST:** Please provide supplemental responses covering the period October 1, 2001 to April 30, 2002, to Interrogatories Nos. 22, 23, 69, and 87, from AT&T, SECCA, Brooks Fiber, MCImetro, WorldCom, Time Warner, XO Tennessee, and Covad which were served on August 21, 2001.

**RESPONSE:** See attached.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
Consolidated CLEC 1<sup>st</sup> Data Requests  
May 23, 2002  
Item No. 4

ATTACHMENTS

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
AT&T, SECCA, WorldCom, Time Warner, XO, Covad's  
1<sup>st</sup> interrogatories  
August 21, 2001  
SUPPLEMENTAL Item 22  
Page 1 of 1

REQUEST: List and identify the purpose of all changes implemented to the BellSouth retail interfaces known as the Regional Negotiation System (RNS) and Regional Ordering System (ROS) from January 2000 to the present.

SUPPLEMENTAL RESPONSE COVERING THE PERIOD OCTOBER 1, 2001 TO APRIL 30, 2002.

See attached.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
AT&T, SECCA, WorldCom, Time Warner, XO, Covad's  
1<sup>st</sup> interrogatories  
August 21, 2001  
SUPPLEMENTAL Item 22  
ATTACHMENT

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
AT&T, SECCA, WorldCom, Time Warner, XO, Covad's  
1<sup>st</sup> interrogatories  
August 21, 2001  
SUPPLEMENTAL Item 23  
Page 1 of 1

REQUEST: Provide LCSC employee monthly turn-over (retention) rates from January 2000 to the present.

SUPPLEMENTAL RESPONSE COVERING THE PERIOD OCTOBER 1, 2001 TO APRIL 30, 2002.

The average monthly turn over(attrition) rate for the service representatives in the department for which the LCSC resides was 1.45% for 2000 and 1.32% for 2001. Due to the consistency of the headcount and the low volume of turn over, this number has not been compiled for 2002.

REQUEST: What business processes have been changed since September to improve the provisioning of line sharing? What process improvements are being prepared for line sharing provisioning?

SUPPLEMENTAL RESPONSE COVERING THE PERIOD OCTOBER 1, 2001 TO APRIL 30, 2002.

BellSouth continues to object to this Request to the extent it implies that BellSouth needs to improve provisioning of line sharing.

To date, there have been no significant changes to "business processes". However, in the line sharing collaborative meetings, (regularly scheduled meetings between BellSouth and all interested DLECs) BellSouth and DLECs are continually working to "fine tune" various methods, procedures, etc. to better meet DLECs needs. The results of which may be seen at the Collaborative Web site:  
[http://www.interconnection.bellsouth.com/markets/lec/line\\_sharing\\_collab/index.html](http://www.interconnection.bellsouth.com/markets/lec/line_sharing_collab/index.html)



BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
AT&T, SECCA, WorldCom, Time Warner, XO, Covad's  
1<sup>st</sup> interrogatories  
August 21, 2001  
SUPPLEMENTAL Item 87  
Page 1 of 1

REQUEST: What is BellSouth's present day market share of the Tennessee DSL market?  
Please provide all documentation supporting your response.

SUPPLEMENTAL RESPONSE COVERING THE PERIOD OCTOBER 1, 2001 TO APRIL  
30, 2002.

BellSouth considers this information to be proprietary and it is being provided  
subject to the terms of the protective order.

As of June 10, 2002, BellSouth had 52,769 DSL subscribers in Tennessee.

The DSL organization does not have any documentation or estimates of DSL  
subscribers for other facility-based competitors in Tennessee. Without that  
information, it is impossible to determine BellSouth's present day market share  
in Tennessee.

REQUEST: For the year 2001, provide the total number of BellSouth's Tennessee:

- A. Local minutes
- B. Local calls
- C. IntraLATA toll minutes
- D. IntraLATA toll calls
- E. InterLATA access minutes
- F. InterLATA access calls

RESPONSE: For b, d and f, BellSouth does not track local ,intraLATA or interLATA messages as a routine part of the management of the business.

For a, c and e, see attached.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
Consolidated CLEC 1<sup>st</sup> Data Requests  
May 23, 2002  
Item No. 5  
ATTACHMENT

REQUEST: For the most recent six-month period, please provide BellSouth's monthly wholesale revenues on a Tennessee-specific and regional basis for each of the following:

- A. Residential resale;
- B. Business resale;
- C. Unbundled network elements; and
- D. Interconnection

RESPONSE: See attached.

BellSouth Telecommunications, Inc.  
Tennessee Regulatory Authority  
Docket No. 97-00309  
Consolidated CLEC 1<sup>st</sup> Data Requests  
May 23, 2002  
Item No. 6  
ATTACHMENT

REQUEST: From the time period July 2001 to the present, please describe:

1. How many separate times BellSouth disconnected interconnection trunks in Tennessee and each of the other states in BellSouth's region. This includes reducing the size of existing trunk groups by disconnecting members of the trunk group;
2. In what specific locations did BellSouth disconnect interconnection trunks in Tennessee and each of the other states in BellSouth's region;
3. In the above instances, how many days prior to the disconnect did BellSouth notify AT&T that the disconnect would occur;
4. In how many of these instances did BellSouth await a response from AT&T that the disconnect was appropriate?
5. What method of communication does BellSouth utilize to communicate such disconnect activities to AT&T?

RESPONSE: BellSouth is compiling its response and will supplement this response as soon as possible.

REQUEST: Describe the process used by BellSouth for determining the date when BellSouth begins charging CLECs for power usage.

- (a) Do these charges begin at the time that power is drained by the CLEC or when the CLEC accepts the collocation cage?
- (b) Please identify, by collocation site, the actual power drain incurred by AT&T and the corresponding feeder fuse size placed, as follows:

<i>S I T E - X</i>	<i>Actual Drain</i>	<i>Fused Ampere</i>
When Power Charges begin (date)		
At 3 months after cage acceptance		
At 6 months after cage acceptance		
At 1 year after cage acceptance		
At 18 months after cage acceptance		

- RESPONSE: (a) BellSouth begins billing the CLEC for the power it requested on its BFFO at the Space Ready Date or the date that the CLEC accepts the space, whichever is sooner.
- (b) BellSouth is compiling its response and will supplement this response as soon as possible.

**REQUEST:** Identify the members of all groups of BellSouth employees and its contractors or vendors associated with BellSouth's review and implementation of change requests under the Change Control process Document. This should include but not be limited to the groups known as the "Triage Committee", the "Change Review Board", the "Directors Committee", the "Release Prioritization Team", the "Third Party Testing Team", the "Regulatory Team" the LCSD Team", the Project Managers", the "BellSouth IT Team", and "BTSTI".

**RESPONSE:** BellSouth objects to this request on the grounds that it is not relevant to the issues in this proceeding and not relevant to the issues in this proceeding and not calculated to lead to the discovery of admissible evidence. BellSouth's provision of nondiscriminatory access to OSS currently is not an issue in this docket. As the CLECs themselves argued, "BellSouth's 271 filing should be suspended until such time as the Authority has completed Phase II of [the OSS docket] and, determined whether BellSouth provides nondiscriminatory access to its OSS in Tennessee." Response to Proposed Hearing Dates, Docket No. 97-00309, 6/6/02, at 6. Notwithstanding its objection, in an effort to avoid discovery disputes, BellSouth has voluntarily chosen to respond to this request, given that the CLECs chose to conduct OSS discovery in this docket. However, BellSouth will not respond to additional discovery on OSS in this or any other docket.

Change Review Board - Doyle Mote-Chairperson - Documentation/Change Review Board

CLEC Change Control Manager (CCCM) - The CCM is the ALEC's employee and the ALEC's point of contact for Change Requests. This individual is responsible for presenting the ALEC's Change Requests at the Change Review Meetings.

BellSouth Change Control Manager (BCCM) - Valerie Cottingham

Release Management Project Team - Meena Masih

Triage Committee - Dennis Davis